

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WILLIAM QUINONES AMBERT
SONIA NOEMI GONZALEZ BAEZ

DEBTORS

CASE NO 15-05767-MCF

CHAPTER 13

**DEBTORS' MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COME, WILLIAM QUINONES AMBERT and SONIA NOEMI GONZALEZ BAEZ, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors are hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated April 5, 2016, herewith and attached to this motion.
2. This Plan modification is filed to amend the Payment Plan Schedule due to debtors' current financial situation.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

Page -2-
Post confirmation modification of chapter 13 Plan
Case no. 15-05767-MCF13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 5th day of April, 2016.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:15-bk-5767

QUINONES AMBERT, WILLIAM & GONZALEZ BAEZ, SONIA NOEMI

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>4/05/2016</u>		<input type="checkbox"/> AMENDED PLAN DATED: _____																																			
<input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION		Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																																			
I. PAYMENT PLAN SCHEDULE																																					
<table><tr><td>\$</td><td>375.00</td><td>x</td><td>8</td><td>=</td><td>\$</td><td>3,000.00</td></tr><tr><td>\$</td><td>325.00</td><td>x</td><td>52</td><td>=</td><td>\$</td><td>16,900.00</td></tr><tr><td>\$</td><td></td><td>x</td><td></td><td>=</td><td>\$</td><td></td></tr><tr><td>\$</td><td></td><td>x</td><td></td><td>=</td><td>\$</td><td></td></tr><tr><td>\$</td><td></td><td>x</td><td></td><td>=</td><td>\$</td><td></td></tr></table>			\$	375.00	x	8	=	\$	3,000.00	\$	325.00	x	52	=	\$	16,900.00	\$		x		=	\$		\$		x		=	\$		\$		x		=	\$	
\$	375.00	x	8	=	\$	3,000.00																															
\$	325.00	x	52	=	\$	16,900.00																															
\$		x		=	\$																																
\$		x		=	\$																																
\$		x		=	\$																																
TOTAL: \$ <u>19,900.00</u>																																					
Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: _____																																					
<input type="checkbox"/> Sale of Property identified as follows: _____																																					
<input type="checkbox"/> Other: _____																																					
Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____																																					
PROPOSED BASE: \$ <u>19,900.00</u>																																					
III. ATTORNEY'S FEES (Treated as § 507 Priorities)																																					
Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,888.00</u>																																					
Signed: <u>W Q</u> Debtor																																					
<u>Sonia Ig Bay</u> Joint Debtor																																					
II. DISBURSEMENT SCHEDULE																																					
A. ADEQUATE PROTECTION PAYMENTS OR \$ _____																																					
B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____																																					
2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <u>Reliable Financial S</u> Cr. _____ Cr. _____ # <u>x3632</u> # _____ # _____ \$ <u>14,112.00</u> \$ _____ \$ _____																																					
3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____																																					
4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <u>Coop De A/c Orienta</u> 5. <input type="checkbox"/> Other: _____																																					
6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: _____																																					
C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)																																					
D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____																																					
2. Unsecured Claims otherwise receive PRO-RATA disbursements.																																					
OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) * Debtors to provide ADEQUATE PROTECTION PAYMENTS to Reliable Financial Services through the Trustee in the sum \$150 per month until confirmation. * Debtors to provide auto insurance (Eastern America Insurance Company) upon maturity to Reliable Financial Services through the Plan.																																					

IN RE QUINONES AMBERT, WILLIAM & GONZALEZ BAEZ, SONIA NOEMI
Debtor(s)

Case No. 3:15-bk-5767

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

	Cr	#	\$
Executory Contracts - Assumed:			Gloria Lizardi Rivera

Label Matrix for local noticing

0104-3

Case 15-05767-MCF13

District of Puerto Rico

Old San Juan

Tue Apr 5 12:53:32 AST 2016

RELIABLE FINANCIAL SERVICES

PO BOX 21382

SAN JUAN, PR 00928-1382

COOP A/C ORIENTAL

PO BOX 876

HUMACAO, PR 00792-0876

Quantum3 Group LLC as agent for

Sadino Funding LLC

PO Box 788

Kirkland, WA 98083-0788

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

Acceptance Now
5501 Headquarters Dr
Plano, TX 75024-5837

Ahorro Muebles

Carr 172 De Caguas A Cidra

Caguas, PR 00725

COOP DE A/C ORIENTAL

PO BOX 876

HUMACAO, PR 00792-0876

Caribbean Finance
PO Box 9046
Caguas, PR 00726-9046

Claro

Po Box 360998

San Juan, PR 00936-0998

First Federal Savings

Ponce De Leon Av Stop 23

San Juan, PR 00901

Islandfin
Pob 71504
San Juan, PR 00936-8604

MONEY EXPRESS

CONSUMER SERVICE CENTER

BANKRUPTCY DIVISION- (CODE 248)

PO BOX 9146

SAN JUAN, PR 00908-0146

OASIS FINANCIAL SERVICES

PO BOX 1011

BAYAMON PR 00960-1011

Oasis Fin Sv
275 Lemay Ferry Ro
Saint Louis, MO 63125-1239

SANTANDER FINANCIAL D/B/A ISLAND FINANCE

PO BOX 195369

SAN JUAN PR 00919-5369

Synchrony Bank
c/o of Recovery Management Systems Corp
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

ALEJANDRO OLIVERAS RIVERA
ALEJANDRO OLIVERAS CHAPTER 13 TRUS
PO BOX 9024062
SAN JUAN, PR 00902-4062

MONSITA LECAROZ ARIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

SONIA NOEMI GONZALEZ BAEZ
275 LUIS LOZADA ST (BAJOS)
CAGUAS, PR 00725-5442

WILLIAM QUINONES AMBERT

275 LUIS LOZADA ST (BAJOS)

CAGUAS, PR 00725-5442

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d) RELIABLE FINANCIAL SERVICES, INC.

P.O. BOX 21382

SAN JUAN, PR 00928-1382

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Quantum3 Group LLC as agent for	End of Label Matrix
Sadino Funding LLC	Mailable recipients 21
PO Box 788	Bypassed recipients 1
Kirkland, WA 98083-0788	Total 22